

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	CASE NO. 2:20-MJ-288
v.	:	MAGISTRATE JUDGE JOLSON
LEATHA INEZ SAVAGE,	:	
Defendant.	:	

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, Leatha Inez Savage, through undersigned counsel, respectfully moves the court for an order to modify Defendant's conditions of release that were set on April 20, 2020, in the above-referenced case. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted,

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY
Ohio Supreme Court No. 0030772
523 South Third Street
Columbus, Ohio 43215
(614) 242-3939 – Office
(614) 242-3999 – Fax

Counsel for Defendant

MEMORANDUM

Following her initial appearance, Counsel for Defendant requests a modification of the court's conditions of release. Defendant has complied with every condition of the court. Defendant desires to have her trial travel limitation expanded to the Continental United States. Assistant United States Attorney Sheila Lafferty is not opposed to this request.

Respectfully submitted,

/s/ **Samuel H. Shamansky**
SAMUEL H. SHAMANSKY
Ohio Supreme Court No. 0030772
523 South Third Street
Columbus, Ohio 43215
(614) 242-3939 – Office
(614) 242-3999 – Fax

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Assistant U.S. Sheila Lafferty, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215, on July 29, 2021.

/s/ **Samuel H. Shamansky**
SAMUEL H. SHAMANSKY